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Other

Title

UC Comments in Response to 2024-16501 (89 FR 60980) & 2024-22041 (89 FR 78278), International Traffic in Arms Regulations: Revisions to Definition and Controls Related to Defense Services (July 29, 2024), RIN 0694-AI35

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October 15, 2024

Sarah Heidema
Director, Office of Defense Trade Controls Policy
Directorate of Defense Trade Controls
U.S. Department of State
Submitted via [regulations.gov](https://www.regulations.gov)

**RE: UC Comments in Response to [2024-16501 \(89 FR 60980\)](#) & [2024-22041 \(89 FR 78278\)](#),
International Traffic in Arms Regulations: Revisions to Definition and Controls Related to
Defense Services (July 29, 2024), RIN 0694-AI35**

Dear Director Heidema:

I write on behalf of the University of California (UC) system – comprised of ten campuses, six academic health centers, and three affiliated U.S. Department of Energy national laboratories – regarding the Directorate of Defense Trade Controls' (DDTC) proposed amendments to the International Traffic in Arms Regulations (ITAR) originally issued on July 29, 2024.

UC appreciates DDTC's efforts to advance U.S. foreign policy interests while providing increased clarity around defense services, particularly regarding controlled versus non-controlled activities and other sensitive services provided to foreign entities under the ITAR. The proposed rule reflects a carefully considered approach to safeguard national security while supporting important professional and academic exchanges.

We encourage the government's consideration of recommendations and requests submitted by the Association of University Export Control Officers (AUECO) and Council on Government Relations (COGR). In particular, it would be helpful to have clarification regarding exclusions for repair or maintenance of commodities or software subject to Export Administration Regulations, routine academic activities, and medical and translation services, as well as additional definitions relating to intelligence activities under the proposed Category IX(s). Such additional information would resolve ambiguities that could impact academic low-risk and research activities.

Thank you for the opportunity to comment. We look forward to continued engagement on this important issue. If you have any questions concerning these comments, please contact Andy Perkins, Policy Resource Coordinator/Research Policy Manager, at Andy.Perkins@ucop.edu.

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Sincerely,

A handwritten signature in black ink, reading "Lourdes G. DeMattos". The signature is fluid and cursive, with the first name "Lourdes" being larger and more prominent than the last name "DeMattos".

Lourdes G. DeMattos

Director, Research Policy Analysis & Coordination

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